

Received  
12/30/97

NOTIFICATION PURSUANT TO

SECTION 6 OF DSHEA

AND 21 C.F.R. 5101.93

'98 FEB 18 A8 55

This notification is being filed on behalf of Nutraceutical Products Company, dba NUPRO which is the marketer of the product(s) which bear the statements identified in this notification. Its business address is: 735-L Park St, Castle Rock, CO 80104. This notification is being made pursuant to Section 6 of DSHEA and Rule 21 C.F.R. §101.93. The dietary supplement product on whose label or labeling the statements appear is OsteoFlex GS-12.

The text of each structure-function statement for which notification is now being given is:

- (Statement 1) The connective tissue and cartilage in the body includes a natural compound, Glucosamine, involved in the formation of nails, tendons, skin, eyes, bones, ligaments and heart valves. Most importantly, it contributes to the strength and integrity of joint structures.
- (Statement 2) Powderized cartilage with calcium, phosphorus, amino acids, mucopolysaccharides and chondroitin sulfate, a helpful agent for managing swelling. Shark Cartilage seems to manage the body's ability to generate new blood vessels, a factor in the swelling and stiffness associated with over-used or aging joints.
- (Statement 3) Called "The Opener of the Way" in Peru, Cat's Claw supports the bowel, immune system, gastrointestinal tract, digestive system, cardiovascular system and helps with muscle discomfort.
- (Statement 4) Vital in the production and assimilation of collagen, an important cellular component of connective tissues, muscles, tendons, bones, teeth and skin. Humans are incapable of synthesizing Vitamin C and must rely on dietary sources or supplements for optimal health.
- (Statement 5) The Tumeric rhizome is widely utilized to support joint function.
- (Statement 6) Magnesium, vital to enzyme activity, assists in calcium and potassium uptake, plays a role in the formation of bone and in carbohydrate and mineral metabolism.
- (Statement 7) Required by all cells in the body and is concentrated in the organs. Known as the anti-stress vitamin it plays a role in the production of adrenal hormones, the formation of antibodies, aids in vitamin utilization and helps convert fats, carbohydrates and proteins into energy.
- (Statement 8) In traditional Indian systems (Ayurveda), Ginger is used to support the joints and circulatory system.
- (Statement 9) Noted as a flavoring, the multitude of beneficial effects of licorice is attributed to the presence of glycyrrhizin. A hydrolyzed compound of glycyrrhizin (Glycyrrhetic acid) is used in Europe for its ability to maintain normal fluid levels in joints.
- (Statement 10) Minute quantities of Manganese are needed for protein and fat metabolism, healthy nerves, healthy immune system and blood sugar regulation. It is used for energy production and required for bone growth and reproduction.
- (Statement 11) Needed for proper circulation and healthy skin, aids in the functioning of the nervous system in the metabolism of carbohydrates, fats and proteins.
- (Statement 12) Trace amounts of Boron are needed for calcium uptake and healthy bones.
- (Statement 13) Cartilage and connective tissue in the body include a natural compound, Glucosamine, contributing to the strength and integrity of joint structures. OsteoFlex GS-12 is a unique combination of 12 natural ingredients, formulated to nourish cartilage, joints and skeletal structures.

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The following summary identifies the dietary ingredient(s) or supplement(s) for which a statement has been made:

Statement number	Identity of Dietary Ingredient(s) or Supplement that is the Subject of the Statement
1.	Glucosamine Sulfate
2.	Shark Cartilage Concentrate:
3.	Cat's Claw (Uncaria Tomentosa):
4.	Vitamin C:
5.	Curcumin (Tumeric 50:1):
6.	Magnesium Sulfate:
7.	Pantothenic Acid (vitamin B <sub>5</sub> ):
8.	Ginger (root):
9.	Licorice (root):
10.	Manganese Sulfate:
11.	Niacinamide (Vitamin B <sub>3</sub> ):
12.	Boron Citrate
13.	OsteoFlex GS-12 Formula

The following identifies the brand name of each supplement for which a statement is made:

Statement Number	Brand Name	Label or Labeling
1 - 13	OsteoFlex GS-12	NUPRO

I, Sherilyn R. Lucas, am authorized to certify this Notification on behalf of Nutraceutical Products Company, dba NUPRO. I certify that the information presented and contained in this Notification is complete and accurate, and that Nutraceutical Products Company, dba NUPRO has substantiation that each structure-function statement is truthful and not misleading,

Date Signed: December, 16, 1997

By: Sherilyn R. Lucas  
 Sherilyn R. Lucas  
 Administrative Assistant